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12 Attorneys for Defendant
13 TWILIO INC.

14 UNITED STATES DISTRICT COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA
17
18 SAN FRANCISCO DIVISION

19 JONATHON PERRY-HUDSON, individually
20 and on behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 TWILIO, INC.,

24 Defendant.

Case No. 3:24-cv-03741-VC

**REPLY DECLARATION OF IAN KANIG
IN SUPPORT OF DEFENDANT TWILIO
INC.'S MOTION TO COMPEL
INDIVIDUAL ARBITRATION**

Date: October 31, 2024
Time: 10:00 a.m.
Courtroom: 4 —17th Floor
Judge: Hon. Vince Chhabria

Date Filed: June 21, 2024
Trial Date: Not Yet Set

REPLY DECLARATION OF IAN KANIG

1
2 1. I am an attorney at Keker, Van Nest & Peters, LLP, counsel of record for
3 Defendant Twilio Inc. in the above-captioned action. I am licensed to practice in the State of
4 California and before this Court. I have personal knowledge of the facts stated herein, and I could
5 and would competently testify thereto if called as a witness. In this declaration, I refer to Thirty
6 Madison, Inc. as “Keeps,” which I understand is one brand name under which it does business. I
7 submit this reply declaration in support of Twilio’s motion to compel individual arbitration.

Keeps Presentment of Keeps Terms and Keeps Privacy Policy

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9 2. Attached hereto as **Exhibit F** is a true and correct copy of the sign-in wrap screen
10 that Keeps presented to persons who completed its intake questionnaire as of May 22, 2023,
11 which includes a link to the Keeps Terms and Keeps Privacy Policy, and is publicly available at
12 <https://web.archive.org/web/20230522143240/https://www.keeps.com/quiz/lead?products=211>
13 (downloaded from the Wayback Machine on September 25, 2024).

14 3. Attached hereto as **Exhibit G** is a true and correct copy of the sign-in wrap screen
15 that Keeps currently presents to persons who complete its intake questionnaire, which includes a
16 link to the Keeps Terms and Keeps Privacy Policy in materially the same way they are presented
17 in Exhibit F, and is publicly available at <https://www.keeps.com/quiz/lead?products=211%2C921>
18 (downloaded from the above-referenced link on October 8, 2024). This exhibit is redacted to
19 exclude the personal-identifying information of the undersigned attorney.

20
21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct. Executed on October 10, 2024, at San Francisco, California.

23
24 
25 IAN KANIG
26 Counsel for Defendant TWILIO INC.
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